

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
YEMISI AKINYEMI,	:
Plaintiff,	:
	:
v.	:
	:
MICHAEL CHERTOFF, SECRETARY,	:
DEPARTMENT OF HOMELAND	:
SECURITY,	:
	:
Defendant.	:
	:
-----X	

07 Civ. 4048 (AJP)

DECLARATION OF JOHN D. CLOPPER

I, John D. Clopper, do hereby state and declare as follows in accordance with the provisions of 28 U.S.C. § 1746:

1. I am an Assistant United States Attorney in the office of Michael J. Garcia, United States Attorney for the Southern District of New York. In this capacity, I represent Michael Chertoff, Secretary, Department of Homeland Security (the "Government"), in the above-captioned case. I submit this declaration in support of the Government's motion for summary judgment.

2. Attached as Exhibit 1 is a true copy of a Federal Career Intern Program Employment Agreement, signed by the plaintiff.

3. Attached as Exhibit 2 is a true copy of relevant excerpts of the transcript of the deposition of Yemisi Akinyemi taken in this case on September 12, 2007.

4. Attached as Exhibit 3 is a true copy of the letter, dated December 20, 2005, terminating plaintiff's employment with Customs and Border Protection.

5. Attached as Exhibit 4 is a true copy of relevant sections of Customs and Border Protection's Standards of Conduct.

6. Attached as Exhibit 5 is a true copy of relevant excerpts of the transcript of the deposition of Officer Patrick Murphy taken in this case on October 29, 2007.

7. Attached as Exhibit 6 is a true copy of relevant excerpts of the transcript of the deposition of Officer Sharmila Zaman taken in this case on October 31, 2007.

8. Attached as Exhibit 7 is a true copy of relevant excerpts of the transcript of the deposition of Officer Elba Riley taken in this case on October 26, 2007.

9. Attached as Exhibit 8 is a true copy of relevant excerpts of the transcript of the deposition of Officer Jolanta Gluba taken in this case on October 31, 2007.

10. Attached as Exhibit 9 is a true copy of relevant excerpts of the transcript of the deposition of Susan Mitchell taken in this case on October 4, 2007.

I declare under penalty of perjury that the foregoing is true and correct based on information, knowledge, and belief.

Executed on January 25, 2008

/s/ John D. Clopper
John D. Clopper